

SUMMARY OF ATTACHED EXHIBITS

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	Notice of Motion and Opportunity to Object
Exhibit 3	None [No Brief in Support of Motion for Relief from Automatic Stay]
Exhibit 4	Certificate of Service
Exhibit 5	None [No Affidavits Filed Specific to This Motion]
Exhibit 6.1	Unfair Labor Practice Charge, dated 5/16/14
Exhibit 6.2	ALJ Stern's correspondence dated 5/29/14
Exhibit 6.3	Unit Clarification Petition, dated 6/16/14 and correspondence from MERC Director, Ruthanne Okun
Exhibit 6.4	Opinion and Order Denying Without Prejudice the City of Detroit's Motion to Dismiss (Case No. 77-71100, Hon. Sean Cox, dated 9/9/11)
Exhibit 6.5	Order (Case No. 77-71100, Hon. Sean Cox, dated 11/4/11)
Exhibit 6.6	Order (Case No. 77-71100, Hon. Sean Cox, dated 8/23/12)
Exhibit 6.7	Opinion and Order Regarding the DWSD's Motion for Interim Order (Case No. 77-71100, Hon. Sean Cox, dated 10/5/12)
Exhibit 6.8	Opinion and Order (Case No. 77-71100, Hon. Sean Cox, dated 12/14/12)
Exhibit 6.9	Opinion and Order Ruling on remaining Requests in the DWSD's Motion for Interim Order (Case No. 77-71100, Hon. Sean Cox, dated 1/30/13)
Exhibit 6.10	Opinion and Order Terminating Second Amended Consent Judgment and Closing this Case (Case No. 77-71100, Hon. Sean Cox, dated 3/27/13)

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	
)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	
_____)	

**ORDER GRANTING THE PETITIONER’S MOTION FOR RELIEF FROM
AUTOMATIC STAY**

This matter coming before the Court on the Petitioner AFSCME’s *Motion for Relief from Automatic Stay* and the Court having determined that the legal and factual bases as set out in the motion establish just cause for relief;

IT IS HEREBY ORDERED THAT:

The Motion is GRANTED.

Dated:_____

Honorable Steven W. Rhodes
United States Bankruptcy Judge

**NOTICE OF MOTION FOR RELIEF FROM THE
AUTOMATIC STAY & OPPORTUNITY TO OBJECT**

American Federation of State, County and Municipal Employees Michigan Council 25("AFSCME") and its affiliated Locals 207, 2394 and 2920 has filed papers with the court to lift the automatic stay for the purpose of allowing the Michigan Employment Relations Commission ("MERC") to hear AFSCME's Unfair Labor Practice Charge ("ULP") and Unit Clarification Petition ("UCP") against the City of Detroit ("City" or "Debtor").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to lift the automatic stay, or if you want the court to consider your views on the motion, within fourteen (14) days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:¹

United States Bankruptcy Court
211 West Fort Street
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Richard G. Mack
Ada A. Verloren
Miller Cohen, P.L.C.
600 West Lafayette Street
Detroit, MI 48226
(313) 964 4454 (Phone)
(313) 964 4490 (Fax)
richardmack@millercohen.com
averloren@millercohen.com

Tere M. McKinney
600 West Lafayette Street. Suite 500
Detroit, MI 48226
(313) 964 1711 (Phone)
(313) 964 0230 (Fax)
tmckinney@miascme.org

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: _____

Signature _____
Name
Address

¹ Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
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In re)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
)	Hon. Steven W. Rhodes
)	
_____)	

CERTIFICATE OF SERVICE

The undersigned certifies that on August 11, 2014, the *American Federation of State, County and Municipal Employees Council 25's Motion to Clarify, or in the Alternative Lift the Automatic Stay*, with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

/s/ Richard G. Mack, Jr.
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